

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,

Plaintiffs,

v.

ANDREA CABRAL, SUFFOLK COUNTY
SHERIFF'S DEPARTMENT, SUFFOLK
COUNTY, and CORRECTIONAL
MEDICAL SERVICES, INC.,

Defendants.

Civil Action No. 04-11935-DPW

**ASSENTED TO MOTION OF THE UNITED STATES
FOR EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' MOTIONS TO COMPEL**

The United States respectfully moves for an extension of time until August 26, 2005, to respond to the Defendants' Motions to Compel the Production of Testimony and Documents From the Federal Bureau of Investigation and from the United States Attorney's Office. Good cause exists for this Motion.

Counsel for the Defendants and undersigned counsel have conferred and concur that responding to both motions at the same time would be more efficient since they both involve the same subject matter. Counsel are also exploring the possibility of resolving Defendants' information and testimony requests without further litigation. The additional time will allow for more thorough evaluation and discussion. Defendants' counsel has assented to this Motion.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose. Therefore, the United States respectfully request that the Court grant this Motion and approve the proposed extension of time for the United States to file its response until August 26, 2005.

Respectfully submitted,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Anton P. Giedt
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LOCAL RULE 7.1(A)(2) CERTIFICATION

Undersigned counsel certifies that pursuant to the requirements under Local Rule 7.1(A)(2), he has conferred with Defendants' counsel of record and that Defendants' counsel has assented to this motion.

/s/ Anton P. Giedt
Anton P. Giedt
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
DATE: August 10, 2005

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record through electronic filing and by first class mail.

/s/ Anton P. Giedt
Anton P. Giedt
Assistant U.S. Attorney

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